

April 3, 2015

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Notice of Ex Parte Meetings
PS Docket No. 14-174, GN Docket No. 13-5, RM-11358, WC Docket No. 05-25,
RM-10593**

Dear Ms. Dortch,

On April 2, 2015, Lawrence Freedman, Senior Vice President of WorldNet Telecommunications, Inc. ("WorldNet") met with Mr. Nicholas Degani, Legal Advisor to the Office of Commissioner Pai.

In the meeting, Mr. Freedman addressed WorldNet's previously filed comments regarding the Commission's proposed rulemaking with regard to the retirement of copper facilities by incumbent local exchange carriers. Mr. Freedman explained that WorldNet is a locally-owned, Puerto Rico competitive local exchange company that predominantly serves small- and medium-sized business customers in Puerto Rico and that WorldNet does so predominantly through the lease of unbundled ILEC copper facilities. To this end, Mr. Freedman echoed and re-emphasized the points made by WorldNet in its publicly filed comments regarding the Commission's copper retirement rule proposals, focusing particularly on the need for some measure of regulatory scrutiny over proposed ILEC copper retirements and clarity and certainty with regard to the options available to competitors to if and when ILEC copper is retired, including, without limitation, continued access to unbundled ILEC DS0, DS1, and DS3 loops, continued access to facilities that will enable the continued provision of DSL, and the option to purchase ILEC copper facilities subject to certain pre-established guidelines and appropriate regulatory oversight.

Respectfully submitted,



Richard Davis
Counsel for WorldNet Telecommunications, Inc.

cc: Mr. Nicholas Degani